

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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DR. RUTH C. MAY and DR. DONNA E.  
LEDGERWOOD, *on behalf of themselves*  
*and all other similarly situated,*

Plaintiffs,

v.

BARCLAYS PLC and BARCLAYS BANK  
PLC,

Defendants.

Case No: 23-cv-2583 (LJL)

-----X  
KENNY BAKER, *individually and on*  
*behalf of all others similarly situated,*

Plaintiffs,

v.

BARCLAYS PLC, BARCLAYS BANK  
PLC, JAMES E. STALEY, C.S.  
VENKATAKRISHNAN, TUSHAR  
MORZARIA, STEVEN EWART, TIM  
THROSBY, ANNA CROSS, NIGEL  
HIGGINS, ALEX THURSBY, HELEN  
KEELAN, HÉLÈNE VLETTER-VAN  
DORT, JEREMY SCOTT, and MARIA  
RICHTER,

Defendants.

Case No: 23-cv-4881 (LJL)

-----X  
**STIPULATION AND [PROPOSED] ORDER SETTING BRIEFING SCHEDULE**

Lead Plaintiffs Dr. Ruth C. May, Dr. Donna E. Ledgerwood, Justin Reed, Jeffrey Knapp, and Mark Howarth (collectively, “Lead Plaintiffs”), by and through their counsel, and Defendants Barclays PLC and Barclays Bank PLC (collectively, “Barclays”), by and through their counsel, hereby stipulate and agree as follows and jointly request that the Court enter the below Order approving this Stipulation:

WHEREAS, on March 27, 2023, Dr. Ruth C. May and Dr. Donna E. Ledgerwood filed a Class Action Complaint against Barclays (ECF No. 1<sup>1</sup>);

WHEREAS, on June 12, 2023, Kenny Baker filed a Class Action Complaint against Barclays and certain individual defendants (“*Baker* Action”) (*see* ECF No. 60 at 7);

WHEREAS, on September 13, 2023, the Court appointed Dr. Ruth C. May, Dr. Donna E. Ledgerwood, Justin Reed, Jeffrey Knapp, and Mark Howarth as Lead Plaintiffs and Mazin A. Sbaiti and Jonathan Bridges of Sbaiti & Company PLLC as Lead Counsel (ECF No. 60);

WHEREAS, by the same September 13, 2023 order (ECF No. 60), the Court consolidated this case with the *Baker* Action; and

WHEREAS, Lead Plaintiffs will file a Consolidated Amended Complaint, and Barclays anticipates moving to dismiss Lead Plaintiffs’ Consolidated Amended Complaint.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the attorneys for the undersigned parties to this action, as follows:

1. Lead Plaintiffs will file a Consolidated Amended Complaint no later than November 17, 2023;
2. Barclays will file a brief in support of its Motion to Dismiss the Consolidated Amended Complaint no later than January 17, 2024;
3. Lead Plaintiffs will file an opposition to Barclays’ Motion to Dismiss the Consolidated Amended Complaint no later than February 22, 2024;
4. Barclays will file a reply in further support of its Motion to Dismiss the Consolidated Amended Complaint no later than March 25, 2024; and

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<sup>1</sup> All ECF references refer to the *May* docket.

5. By entering into this Stipulation, Barclays does not waive, and hereby expressly preserves, all potential defenses in this litigation, including but not limited to defenses relating to service, venue, or jurisdiction.

6. Going forward, the parties are directed to make all filings in the lower captioned case (23-cv-2583) only.

Dated: New York, NY

September 27, 2023

/s/ Mazin A. Sbaiti

SBAITI & COMPANY PLLC

Mazin A. Sbaiti (NY Bar No. 4339057)

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*Counsel for Barclays PLC and Barclays  
Bank PLC*

**SO ORDERED**

New York, NY

Date: September 28, 2023



The Honorable Lewis J. Liman

United States District Judge

**REPRESENTATION OF CONSENT OF OTHER PARTIES**

As required under Rule 8.5(b) of the Southern District of New York's Electronic Case Filing Rules & Instructions, I represent that all parties consented to the filing of this stipulation.

Date: September 27, 2023

/s/ Jeffrey T. Scott

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